

EXHIBIT 16

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

MARYLAND SHALL ISSUE, INC., <i>et al.</i>,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 16-cv-3311-MJG
)	
LAWRENCE HOGAN, in his capacity of)	
GOVERNOR OF MARYLAND, <i>et al.</i>,)	
)	
Defendants.)	

**PLAINTIFF ATLANTIC GUNS, INC.'S ANSWERS TO DEFENDANTS' FIRST SET OF
INTERROGATORIES**

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Atlantic Guns states as follows for its Answers to Defendants' First Set of Interrogatories:

PRELIMINARY STATEMENT

The following responses are based on Plaintiff's knowledge, information, and belief, and are complete to Plaintiff's best knowledge at this time. As discovery proceeds, facts, information, evidence, documents, and things may be discovered that are not set forth in these Answers, but which may be responsive to these Interrogatories. Plaintiff assumes no obligation to supplement or amend voluntarily these Answers beyond applicable legal requirements to reflect information, evidence, documents, or things discovered following service of these Answers. Furthermore, these Answers were prepared based on Plaintiff's good faith interpretation and understanding of Defendants' Interrogatories and are subject to correction for inadvertent errors or omissions, if any. These Answers are given without prejudice to subsequent revision, amendment, or supplementation based upon any information, evidence, and documentation that hereinafter may be discovered; discovery is ongoing.

fingerprinting requirement and are welcome to do so without transferring this burden of identification to Plaintiff.

Without waiving these objections, Plaintiff indicates that he has observed online, through the link to finding a fingerprinting service provider on the Maryland State Police website, that there are many different private vendors. Neither the private vendors, nor the Maryland State Police, list the price online, and Plaintiff has not surveyed those vendors' prices. Plaintiff is just beginning his investigation and may supplement this response as necessary.

7. Identify any Atlantic Guns' customers who have expressed an interest in purchasing handguns, but to whom Atlantic Guns could not sell a handgun because of the HQL requirement.

RESPONSE: Plaintiff objects to this Interrogatory to the extent that it seeks personal customer information of individuals not a party to this lawsuit. Plaintiff further objects to this Interrogatory in that it is unduly burdensome and overbroad in scope and time, specifically as it would require Plaintiff to keep and maintain records in addition those required by law.

Without waiving these objections, Plaintiff is aware of individual potential customers who express an interest in purchasing a handgun but cannot for lack of a Handgun Qualification License. Sometimes potential customers make a deposit toward the purchase. Atlantic Guns holds the deposit. On many occasions, customers will ask for a return of the deposit, having not acquired a Handgun Qualification License. Once the deposit is returned, Atlantic Guns does not retain the potential customer's information. As to deposits currently being held, Atlantic Guns cannot know if the customer is pursuing the Handgun Qualification License or not.

8. Identify any potential customers who have been deterred from purchasing handguns at Atlantic Guns due to the expense and inconvenience of the HQL requirements.

RESPONSE: Please refer to Plaintiff's objections and response to Interrogatory No. 7.

9. Identify any individuals who have an urgent need for a handgun, but who, due to the expense and inconvenience of the HQL requirements, have been deterred from purchasing a handgun.

RESPONSE: Please refer to Plaintiff's objections and response to Interrogatory No. 7.

10. Identify any individuals who hunt for food and are in need of a handgun, but who, due to the expense and inconvenience of the HQL requirements, have been deterred from purchasing a handgun.

RESPONSE: Please refer to Plaintiff's objections and response to Interrogatory No. 7.

11. Identify any individuals who live in an urban area with no access to Maryland State Police ("MSP") certified handgun trainers and/or a shooting range and are in need of a handgun, but who have been deterred from purchasing a handgun by the HQL live-fire requirement.

RESPONSE: Please refer to Plaintiff's objections and response to Interrogatory No. 7.

12. Identify any individuals who live in an area with no access to MSP approved fingerprint vendors and are in need of a handgun, but who have been deterred from purchasing a handgun by the HQL live-scan fingerprinting requirement.

RESPONSE: Please refer to Plaintiff's objections and response to Interrogatory No. 7.

13. If you contend that any defendant has made any admission and/or declaration against interest relating to any claims or defenses involved in this lawsuit, identify the person making each such admission or declaration, the substance of each such admission or declaration, the date of each such admission or declaration and identify all documents relating to each such admission or declaration.

RESPONSE: Plaintiff is currently unaware of any such admission and/or declaration against interest, but notes that discovery in this case is ongoing.

14. Identify and describe all communications you had with anyone, other than your attorneys, concerning any of the matters described in the Complaint, including in your answer the parties to each communication, the subject matter of each communication and the date and time of each communication.

/s/ John Parker Sweeney

John Parker Sweeney (Bar No. 08761)

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VERIFICATION

I affirm under the penalties of perjury that the foregoing Answers to Interrogatories are true to the best of my knowledge, information, and belief.

Date

Steven Schneider for Atlantic Guns, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 2nd day of January, 2018, a copy of Plaintiff Atlantic Guns, Inc.'s Responses to Defendant's First Set of Interrogatories was sent via electronic mail and U.S. Mail, postage prepaid to:

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/s/ John Parker Sweeney
John Parker Sweeney, No. 08761